

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

**LORI WRIGHT and TEDDY E.  
WRIGHT, as Next Friends and  
Parents of Destin Wright, Deceased**

**Plaintiffs,**

**vs.**

**JOHNNY MOATS, Individually and in  
his Official Capacity as Polk County  
Sheriff; J. KELLY MCLENDON,  
Individually and in His Official Capacity  
as Polk County Sheriff; POLK COUNTY,  
GEORGIA; SOUTHERN HEALTH  
PARTNERS, INC.; K. HEATH, LPN;  
SHANNON TURNER, LPN;  
J. THOMAS, LPN; and BETTY  
FOWLER, LPN in their Individual  
Capacities; JOHN DOES I, II, and  
JANE DOES I, II, and III, in their  
Individual Capacities**

**Defendants.**

**CIVIL ACTION FILE  
NO.: 4:15-CV-00059-HLM**

**PLAINTIFF TEDDY E. WRIGHT'S AMENDED NOTICE OF  
VIDEO DEPOSITION OF BETTY FOWLER, LPN**

To: Betty Fowler, LPN  
c/o Shira Adler Crittendon  
Schreeder Wheeler & Flint, LLP  
1100 Peachtree Street, NE, Suite 800  
Atlanta, GA 30309-4516

You are hereby noticed that on **October 21, 2016**, beginning at **1:00 P.M.**, at Gammon, Anderson & McFall, 105 Prior Street, Cedartown, Georgia 30125, counsel for Plaintiff will proceed to take the video deposition of **BETTY FOWLER, LPN**, upon oral examination for the purposes of discovery and all other purposes allowed under the law, pursuant to Federal Rules of Civil Procedure Rules 26 and 30. The video deposition will be taken before an officer duly authorized to administer oaths and to take depositions. The video deposition will be recorded stenographically. The oral examination will continue from day to day until its completion.

This 14th day of October, 2016.

/s/ Robert K. Finnell

Georgia State Bar No. 261575

The Finnell Firm

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Attorney for Teddy E. Wright

/s/ H.L. Cromartie, III

Georgia State Bar No. 197190

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Attorney for Teddy E. Wright

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served counsel for Defendant with a true and exact copy of the **PLAINTIFF TEDDY E. WRIGHT'S AMENDED NOTICE TO TAKE VIDEO DEPOSITION OF BETTY FOWLER, LPN**, by filing same with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorney of record:

Clarence Victor Long  
Office of C. Victor Long  
4995 Erin Road  
Atlanta, GA 30331

Jennifer Jenivene Neal-Jones  
Neal Jones & Handrick Law, LLC  
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Shira Adler Crittendon  
Schreeder Wheeler & Flint, LLP  
1100 Peachtree Street, NE, Suite 800  
Atlanta, GA 30309-4516

This 14<sup>th</sup> day of October, 2016.

/s/ H.L. Cromartie, III  
H.L. Cromartie, III  
Georgia State Bar No: 197190  
Attorney for Plaintiff

**CERTIFICATE OF COMPLIANCE WITH LR 5.1(C)**

This is to certify that the foregoing pleading was prepared using Times New Roman 14 point in accordance with LR 5.1(C).

**H.L. CROMARTIE III, P.C.**

/s/ H.L. Cromartie, III

H.L. Cromartie, III

Georgia State Bar No: 197190

Attorney for Plaintiff